

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

CASE NO. C-03-2289-MJJ

CASE NO. C-03-4669-MJJ

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, et al.,

Defendants

**[PROPOSED] ORDER GRANTING RICOH'S
MOTION FOR SANCTIONS**

This matter came before the Court on January 6, 2003 on a motion by Plaintiff and Declaratory Judgment Defendant Ricoh Company Ltd. ("Ricoh") for sanctions against declaratory judgment plaintiff Synopsys Inc. and Defendants Aeroflex Incorporated, AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox Graphics Inc., Matrox International Corp. and Matrox Tech, Inc. (collectively the "ASIC defendants").

After consideration of the papers filed in support of the motion, any papers filed in opposition, and any oral argument of counsel, the Court finds that:

IT IS ORDERED, ADJUDGED, AND DECREED that Ricoh's motion for sanctions is GRANTED. The testimony of Dr. Thomas shall not be received into evidence, and no party shall seek his testimony relating to either the '432 patent or the '016 patent for any purpose.

IT IS FURTHER ORDERED that Ricoh shall receive an award of fees and expenses of \$_____ for its attorneys' time and expenses related to Synopsys and the ASIC defendants' conduct with respect to Dr. Thomas.

1 IT IS FURTHER ORDERED that counsel for the defendants, [Christopher Kelley and Louis
2 Campbell] [the law firm of Howrey Simon Arnold & White], is hereby disqualified from representing
3 defendants, either directly or indirectly, with respect to either the '432 patent or the '016 patent for any
4 purpose.

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8 SO ORDERED.

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10 Dated: _____, 2004

11 Honorable Martin J. Jenkins
12 Judge, United States District Court

13 Submitted December 2, 2003 by:

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